

**MICHAEL P. KUSHNER**

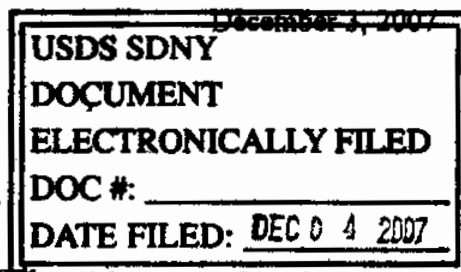
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ADMITTED NY

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Honorable Paul A. Crotty  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



12/4/2007  
Application **GRANTED**  
SO Ordered  
*Paul Crotty*  
USDS

Re: Brown-Bezeal v. City of New York; 07-cv-6675 (PAC)

Your Honor:

I represent the plaintiff in the above-referenced matter. I write jointly with the consent of A.C.C. Susan Scharfstein, Esq., counsel for all defendants, to respectfully request a one month extension of plaintiff's time to move for amendment of the pleadings. Pursuant to Your Honor's initial scheduling order, the parties were to exchange requests and interrogatories by November 13 and initial disclosures were to be produced by November 16. Further, according to this initial schedule, plaintiff had until December 3 to move for amendment of the pleadings. The parties have conducted these preliminary exchanges, however, the CCRB investigatory documents are extensive and as such Ms. Scharfstein intends to produce them within the next two weeks. These investigatory documents are essential for me to most accurately amend the pleadings and save the Court and all parties from any unnecessary litigation associated with the identity of the John Doe Officers. Accordingly, the parties jointly request that the time for plaintiff to move for amendment of the pleadings be extended until January 3, 2008. This is the first request for an extension of this deadline and this extension will not affect any other scheduled dates.

Thank you for your consideration.

Respectfully submitted,

/s/Michael P. Kushner  
Michael P. Kushner, Esq. (MK 6117)

Cc: A.C.C. Susan Scharfstein, Esq.  
*Attorney for defendants*

**MEMO ENDORSED**